



OPASTCO

21 Dupont Circle NW
Suite 700
Washington, DC 20036

February 1, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

***Ex Parte* Notice**

RE: In the Matter of

**Federal-State Joint Board on Universal Service
CC Docket No. 96-45**

Dear Ms. Dortch,

On February 1, 2005, the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) sent the attached letter to Chairman Michael Powell, Commissioner Kathleen Abernathy, Commissioner Jonathan Adelstein, Commissioner Michael Copps, and Commissioner Kevin Martin. The members and staff of the Federal-State Joint Board on Universal Service were also sent copies of the letter. The letter urges the Commissioners to adopt a strong set of standardized minimum criteria for use by state commissions and the FCC when evaluating whether applicants are qualified to be designated as eligible telecommunications carriers (ETCs) in rural service areas. Standardized guidelines would assist regulators in determining whether the public interest would be served by a carrier's designation as an ETC and improve the long-term sustainability of the Universal Service Fund. However, in order for this to occur, state and federal regulators must be committed to using the adopted guidelines and conducting a thorough and rigorous public interest analysis on every competitive ETC application for a rural service area. There must be a high degree of confidence by regulators that the minimum expectations that are adopted can and will be met prior to the granting of ETC status.

In accordance with FCC rules, this notice and the attached letter are being filed electronically in the above-captioned docket.

Sincerely,

/s/ Stuart Polikoff
Director of Government Relations
OPASTCO